PRESENTMENT DATE AND TIME: October 7, 2010 at 12:00 noon (Eastern Time) OBJECTION DATE AND TIME: October 7, 2010 at 11:30 a.m. (Eastern Time)

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Gregory R. Oxford

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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11

MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)

f/k/a General Motors Corp., et al.

:

Debtors. : (Jointly Administered)

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NOTICE OF SETTLEMENT OF ORDER DENYING THE ORAL APPLICATION OF RALLY AUTO GROUP, INC. FOR A STAY PENDING APPEAL OF THE ORDER GRANTING MOTION OF GENERAL MOTORS LLC TO ENFORCE 363 SALE ORDER AND APPROVED DEFERRED TERMINATION AGREEMENT, EXCEPT TO THE LIMITED EXTENT SET FORTH HEREIN

PLEASE TAKE NOTICE that, pursuant to Rule 9074-1 of the Local Rules of

Bankruptcy Procedure for the Southern District of New York, the proposed order, a copy of which is annexed hereto, denying the oral application of Rally Auto Group, Inc. for a stay pending appeal of the *Order Granting Motion of General Motors LLC to Enforce 363 Sale Order and Approved Deferred Termination Agreement* except to the limited extent set forth therein, will be presented for signature and entry to the Honorable Robert E. Gerber, United States Bankruptcy Judge, in

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Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004 on **October 7, 2010 at 12:00 noon (Eastern Time)**.

PLEASE TAKE FURTHER NOTICE that objections or proposed counter-orders must be made in writing and shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-242 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-242, and on (i) King & Spalding LLP, 1185 Avenue of the Americas, New York, New York 10036 (Attn: Arthur Steinberg, Esq. and Scott Davidson, Esq.); (ii) Isaacs Clouse Crose & Oxford LLP, 21515 Hawthorne Boulevard, Suite 950, Torrance, California 90503 (Attn: Gregory R. Oxford, Esq.); and (iii) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.), so as to be received no later than October 7, 2010, at 11:30 a.m. (Eastern Time).

Dated: New York, New York October 5, 2010

Respectfully submitted,

/s/ Arthur Steinberg
Arthur Steinberg
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